

**From:** Meyer, Brianna J. BMeyer@CrivelloLaw.com

**Subject:** RE: Blake

**Date:** April 5, 2024 at 5:47 PM

**To:** kmotley motleylegal.com kmotley@motleylegal.com, Kosmeder, Stephanie N. SKosmeder@CrivelloLaw.com, Baird, Brian W BWBaird@Borgelt.com, nate@cade-law.com, Annalisa Pusick annalisa@cade-law.com

**Cc:** McGaver, Steven C. SMcGaver@CrivelloLaw.com, Rosa, DeAnn DRosa@CrivelloLaw.com, Waterstraat, Jennifer A. JWaterstraat@CrivelloLaw.com

Hi –

The email on 2/27 was to confirm weeks that were completely off the table for me. I certainly did not represent that every day and every time slot following those weeks was wide open for me and our clients. Right now I can relay to you that the following dates work:

Beth – April 16 at 1pm

May – April 17 at 10am

Galvin – April 25 at 2:30pm

I am completely out of office next week and will not be available, but Stephanie is working on getting additional dates and will let you know if anything else is confirmed.

**Brianna J. Meyer | Shareholder**

BMeyer@CrivelloLaw.com  
Direct:414-290-7519



**Crivello, Nichols & Hall, S.C.**

710 North Plankinton Avenue Suite 500  
Milwaukee, Wisconsin 53203  
Main:414-271-7722  
Fax: 414-271-4438  
[CrivelloLaw.com](http://CrivelloLaw.com)

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**From:** kmotley motleylegal.com <kmotley@motleylegal.com>

**Sent:** Thursday, April 4, 2024 2:24 PM

**To:** Kosmeder, Stephanie N. <SKosmeder@CrivelloLaw.com>; Baird, Brian W <BWBaird@Borgelt.com>; Meyer, Brianna J. <BMeyer@CrivelloLaw.com>; nate@cade-law.com; Annalisa Pusick <annalisa@cade-law.com>

**Cc:** McGaver, Steven C. <SMcGaver@CrivelloLaw.com>; Rosa, DeAnn <DRosa@CrivelloLaw.com>; Waterstraat, Jennifer A. <JWaterstraat@CrivelloLaw.com>

**Subject:** Re: Blake

Hello Brianna,

Based on your email of 2/27/24 I understood that you were free to conduct depositions from April 9<sup>th</sup> onwards. Per your letter we received with the discovery the depositions for several of the defendants are at issue. At present, for your clients we have May scheduled for 4/17 and Galvan scheduled for 4/25.

Please let me know by 4pm tomorrow (4/5/24) what dates work for Beth, DiCello, Bissonette 4/19 does not work, and Hayes. Also let us know who will be taking the deposition for the County which is scheduled for 4/16 at 9:00a.m.

Thank you in advance.

Regards,  
Kim

**From:** kmotley motleylegal.com <kmotley@motleylegal.com>

**Sent:** Wednesday, March 13, 2024 9:19 PM

**To:** Kosmeder, Stephanie N. <SKosmeder@CrivelloLaw.com>; Baird, Brian W <BWBaird@Borgelt.com>; Meyer, Brianna J. <BMeyer@CrivelloLaw.com>; nate@cade-law.com <nate@cade-law.com>; Annalisa Pusick <annalisa@cade-law.com>

**Cc:** McGaver, Steven C. <SMcGaver@CrivelloLaw.com>; Rosa, DeAnn <DRosa@CrivelloLaw.com>; Waterstraat, Jennifer A. <JWaterstraat@CrivelloLaw.com>

**Subject:** Re: Blake

**Subject:** RE: Blake

Hello Brianna,

I am reaching out again regarding your emails of 1/11/24 and 2/15/24 discovery is long overdue. When can we expect to receive the outstanding documents?

Regards,  
Kim

---

**From:** Kosmeder, Stephanie N. <[SKosmeder@CrivelloLaw.com](mailto:SKosmeder@CrivelloLaw.com)>  
**Sent:** Wednesday, March 13, 2024 9:37 AM  
**To:** Baird, Brian W <[bwbaire@borgelt.com](mailto:bwbaire@borgelt.com)>; kmotley motleylegal.com <[kmotley@motleylegal.com](mailto:kmotley@motleylegal.com)>; Meyer, Brianna J. <[BMeyer@CrivelloLaw.com](mailto:BMeyer@CrivelloLaw.com)>; [nate@cade-law.com](mailto:nate@cade-law.com) <[nate@cade-law.com](mailto:nate@cade-law.com)>; Annalisa Pusick <[annalisa@cade-law.com](mailto:annalisa@cade-law.com)>  
**Cc:** McGaver, Steven C. <[SMcGaver@CrivelloLaw.com](mailto:SMcGaver@CrivelloLaw.com)>; Rosa, DeAnn <[DRosa@CrivelloLaw.com](mailto:DRosa@CrivelloLaw.com)>; Waterstraat, Jennifer A. <[JWaterstraat@CrivelloLaw.com](mailto:JWaterstraat@CrivelloLaw.com)>  
**Subject:** RE: Blake

Good Morning,

Jeremy May is available on April 17 at 10 a.m. for his deposition.

Thank you.

**Stephanie N. Kosmeder** | Paralegal-Legal Assistant  
[SKosmeder@CrivelloLaw.com](mailto:SKosmeder@CrivelloLaw.com)  
Direct: 414-615-8416



**Crivello, Nichols & Hall, S.C.**  
710 North Plankinton Avenue Suite 500  
Milwaukee, Wisconsin 53203  
Main: 414-271-7722  
Fax: 414-271-4438  
[CrivelloLaw.com](http://CrivelloLaw.com)

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**From:** Baird, Brian W <[bwbaire@borgelt.com](mailto:bwbaire@borgelt.com)>  
**Sent:** Thursday, February 29, 2024 3:59 PM  
**To:** kmotley motleylegal.com <[kmotley@motleylegal.com](mailto:kmotley@motleylegal.com)>; Meyer, Brianna J. <[BMeyer@CrivelloLaw.com](mailto:BMeyer@CrivelloLaw.com)>; Kosmeder, Stephanie N. <[SKosmeder@CrivelloLaw.com](mailto:SKosmeder@CrivelloLaw.com)>; [nate@cade-law.com](mailto:nate@cade-law.com); Annalisa Pusick <[annalisa@cade-law.com](mailto:annalisa@cade-law.com)>  
**Cc:** McGaver, Steven C. <[SMcGaver@CrivelloLaw.com](mailto:SMcGaver@CrivelloLaw.com)>; Rosa, DeAnn <[DRosa@CrivelloLaw.com](mailto:DRosa@CrivelloLaw.com)>; Waterstraat, Jennifer A. <[JWaterstraat@CrivelloLaw.com](mailto:JWaterstraat@CrivelloLaw.com)>  
**Subject:** RE: Blake

Bergmann is available during my dates, April 15-17, 25-26, and 29-May 3.



**Brian W. Baird**  
Attorney  
**Direct:** 414-287-9184  
**Email:** [bwbaire@borgelt.com](mailto:bwbaire@borgelt.com)  
  
1243 N. 10<sup>th</sup> St., Suite 300  
Milwaukee, WI 53205  
[www.borgelt.com](http://www.borgelt.com)

---

**From:** Baird, Brian W  
**Sent:** Thursday, February 29, 2024 6:44 AM  
**To:** kmotley motleylegal.com <[kmotley@motleylegal.com](mailto:kmotley@motleylegal.com)>; Meyer, Brianna J. <[BMeyer@CrivelloLaw.com](mailto:BMeyer@CrivelloLaw.com)>; Kosmeder, Stephanie N. <[SKosmeder@CrivelloLaw.com](mailto:SKosmeder@CrivelloLaw.com)>; [nate@cade-law.com](mailto:nate@cade-law.com); Annalisa Pusick <[annalisa@cade-law.com](mailto:annalisa@cade-law.com)>  
**Cc:** McGaver, Steven C. <[SMcGaver@CrivelloLaw.com](mailto:SMcGaver@CrivelloLaw.com)>; Rosa, DeAnn <[DRosa@CrivelloLaw.com](mailto:DRosa@CrivelloLaw.com)>; Waterstraat, Jennifer A. <[JWaterstraat@CrivelloLaw.com](mailto:JWaterstraat@CrivelloLaw.com)>  
**Subject:** RE: Blake

I will check with Bergmann regarding her availability. My calendar is available April 15-17, 25-26, and 29-May 3.



**Brian W. Baird**  
Attorney  
**Direct:** 414-287-9184  
**Email:** [bwbaird@borgelt.com](mailto:bwbaird@borgelt.com)  
  
1243 N. 10<sup>th</sup> St., Suite 300  
Milwaukee, WI 53205  
  
[www.borgelt.com](http://www.borgelt.com)

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**From:** kmotley motleylegal.com <[kmotley@motleylegal.com](mailto:kmotley@motleylegal.com)>  
**Sent:** Wednesday, February 28, 2024 6:29 PM  
**To:** Meyer, Brianna J. <[BMeyer@CrivelloLaw.com](mailto:BMeyer@CrivelloLaw.com)>; Kosmeder, Stephanie N. <[SKosmeder@CrivelloLaw.com](mailto:SKosmeder@CrivelloLaw.com)>; [nate@cade-law.com](mailto:nate@cade-law.com); Annalisa Pusick <[annalisa@cade-law.com](mailto:annalisa@cade-law.com)>  
**Cc:** McGaver, Steven C. <[SMcGaver@CrivelloLaw.com](mailto:SMcGaver@CrivelloLaw.com)>; Rosa, DeAnn <[DRosa@CrivelloLaw.com](mailto:DRosa@CrivelloLaw.com)>; Waterstraat, Jennifer A. <[JWaterstraat@CrivelloLaw.com](mailto:JWaterstraat@CrivelloLaw.com)>; Baird, Brian W <[bwbaird@borgelt.com](mailto:bwbaird@borgelt.com)>  
**Subject:** Re: Blake

Great Brianna,

So, I will schedule the officers, Corporate Depos, County, & Insurance for April 15<sup>th</sup> onwards.

Brian, I am wondering if how April 15<sup>th</sup> onwards works for your clients as well.

Thanks!

Kim

---

**From:** Meyer, Brianna J. <[BMeyer@CrivelloLaw.com](mailto:BMeyer@CrivelloLaw.com)>  
**Sent:** Tuesday, February 27, 2024 4:42 PM  
**To:** kmotley [motleylegal.com](mailto:kmotley@motleylegal.com) <[kmotley@motleylegal.com](mailto:kmotley@motleylegal.com)>; Kosmeder, Stephanie N. <[SKosmeder@CrivelloLaw.com](mailto:SKosmeder@CrivelloLaw.com)>; [nate@cade-law.com](mailto:nate@cade-law.com) <[nate@cade-law.com](mailto:nate@cade-law.com)>; Annalisa Pusick <[annalisa@cade-law.com](mailto:annalisa@cade-law.com)>  
**Cc:** McGaver, Steven C. <[SMcGaver@CrivelloLaw.com](mailto:SMcGaver@CrivelloLaw.com)>; Rosa, DeAnn <[DRosa@CrivelloLaw.com](mailto:DRosa@CrivelloLaw.com)>; Waterstraat, Jennifer A. <[JWaterstraat@CrivelloLaw.com](mailto:JWaterstraat@CrivelloLaw.com)>; [BWBaird@Borgelt.com](mailto:BWBaird@Borgelt.com) <[BWBaird@Borgelt.com](mailto:BWBaird@Borgelt.com)>  
**Subject:** RE: Blake

Thank you, Kim.

I am in trial both weeks of March 25 and April 1 and (finally) on vacation April 8. The rest of my April is pretty much wide open.

Sorry about that, let me know if those later dates work for you.

**Brianna J. Meyer** | Shareholder

[BMeyer@CrivelloLaw.com](mailto:BMeyer@CrivelloLaw.com)  
Direct: 414-290-7519



**Crivello, Nichols & Hall, S.C.**

710 North Plankinton Avenue Suite 500  
Milwaukee, Wisconsin 53203  
Main: 414-271-7722  
Fax: 414-271-4438  
[CrivelloLaw.com](http://CrivelloLaw.com)

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**From:** kmotley [motleylegal.com](mailto:kmotley@motleylegal.com) <[kmotley@motleylegal.com](mailto:kmotley@motleylegal.com)>

**Sent:** Tuesday, February 27, 2024 3:40 PM

**To:** Meyer, Brianna J. <[BMeyer@CrivelloLaw.com](mailto:BMeyer@CrivelloLaw.com)>; Kosmeder, Stephanie N. <[SKosmeder@CrivelloLaw.com](mailto:SKosmeder@CrivelloLaw.com)>; [nate@cade-law.com](mailto:nate@cade-law.com); Annalisa Pusick <[annalisa@cade-law.com](mailto:annalisa@cade-law.com)>  
**Cc:** McGaver, Steven C. <[SMcGaver@CrivelloLaw.com](mailto:SMcGaver@CrivelloLaw.com)>; Rosa, DeAnn <[DRosa@CrivelloLaw.com](mailto:DRosa@CrivelloLaw.com)>; Waterstraat, Jennifer A. <[JWaterstraat@CrivelloLaw.com](mailto:JWaterstraat@CrivelloLaw.com)>; [BWBaird@Borgelt.com](mailto:BWBaird@Borgelt.com)  
**Subject:** Re: Blake

Hello Brianna and Brian,

Please note that we would like to schedule depositions of the Defendant Officers, Corporate Depositions, and of Ms. Bergmann. I am looking to try to schedule them the week of March 25<sup>th</sup> and the weeks of April 1<sup>st</sup> and 8<sup>th</sup> 2024. Please let me know what their schedule looks like.

Additionally, I am writing to provide Plaintiffs responses to the 1<sup>st</sup> RPD and 1<sup>st</sup> Interrogatories. Thank you for your time and have a great day!

Warm regards,  
Kim

---

**From:** Meyer, Brianna J. <[BMeyer@CrivelloLaw.com](mailto:BMeyer@CrivelloLaw.com)>  
**Sent:** Thursday, February 15, 2024 5:20 PM  
**To:** kmotley <[kmotley@motleylegal.com](mailto:kmotley@motleylegal.com)>; Kosmeder, Stephanie N. <[SKosmeder@CrivelloLaw.com](mailto:SKosmeder@CrivelloLaw.com)>; [nate@cade-law.com](mailto:nate@cade-law.com) <[nate@cade-law.com](mailto:nate@cade-law.com)>; Annalisa Pusick <[annalisa@cade-law.com](mailto:annalisa@cade-law.com)>  
**Cc:** McGaver, Steven C. <[SMcGaver@CrivelloLaw.com](mailto:SMcGaver@CrivelloLaw.com)>; Rosa, DeAnn <[DRosa@CrivelloLaw.com](mailto:DRosa@CrivelloLaw.com)>; Waterstraat, Jennifer A. <[JWaterstraat@CrivelloLaw.com](mailto:JWaterstraat@CrivelloLaw.com)>; [BWBaird@Borgelt.com](mailto:BWBaird@Borgelt.com) <[BWBaird@Borgelt.com](mailto:BWBaird@Borgelt.com)>  
**Subject:** RE: Blake

No problem, Kim. Thank you!

We are just going through the employee files you requested and should be producing soon.

**Brianna J. Meyer | Shareholder**

[BMeyer@CrivelloLaw.com](mailto:BMeyer@CrivelloLaw.com)  
Direct: 414-290-7519



**Crivello, Nichols & Hall, S.C.**

710 North Plankinton Avenue Suite 500  
Milwaukee, Wisconsin 53203  
Main: 414-271-7722  
Fax: 414-271-4438  
[CrivelloLaw.com](http://CrivelloLaw.com)

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**From:** kmotley <[kmotley@motleylegal.com](mailto:kmotley@motleylegal.com)>  
**Sent:** Thursday, February 15, 2024 4:11 PM  
**To:** Kosmeder, Stephanie N. <[SKosmeder@CrivelloLaw.com](mailto:SKosmeder@CrivelloLaw.com)>; [nate@cade-law.com](mailto:nate@cade-law.com); Annalisa Pusick <[annalisa@cade-law.com](mailto:annalisa@cade-law.com)>  
**Cc:** McGaver, Steven C. <[SMcGaver@CrivelloLaw.com](mailto:SMcGaver@CrivelloLaw.com)>; Rosa, DeAnn <[DRosa@CrivelloLaw.com](mailto:DRosa@CrivelloLaw.com)>; Waterstraat, Jennifer A. <[JWaterstraat@CrivelloLaw.com](mailto:JWaterstraat@CrivelloLaw.com)>; Meyer, Brianna J. <[BMeyer@CrivelloLaw.com](mailto:BMeyer@CrivelloLaw.com)>; [BWBaird@Borgelt.com](mailto:BWBaird@Borgelt.com)  
**Subject:** Re: Blake

Counsels,

Please find attached for your records PL Responses to Defendant Officers & County First Request for Admissions.

We are still working on the 1<sup>st</sup> Request for Production of Documents and the 1<sup>st</sup> Request for Interrogatories. We plan to have our responses to you no later than February 23, 2024. Please confirm if you have any issues with regards to our request for an additional eight days to respond to the RPD and Interrogatories. Thank you in advance.

Warm regards,  
Kim

---

**From:** Kosmeder, Stephanie N. <[SKosmeder@CrivelloLaw.com](mailto:SKosmeder@CrivelloLaw.com)>

Sent: Wednesday, January 17, 2024 11:39 AM

To: kmotley [motleylegal.com](mailto:kmotley@motleylegal.com) <[kmotley@motleylegal.com](mailto:kmotley@motleylegal.com)>; nate@cade-law.com <[nate@cade-law.com](mailto:nate@cade-law.com)>

Cc: McGaver, Steven C. <[SMcGaver@CrivelloLaw.com](mailto:SMcGaver@CrivelloLaw.com)>; Rosa, DeAnn <[DRosa@CrivelloLaw.com](mailto:DRosa@CrivelloLaw.com)>; Waterstraat, Jennifer A. <[JWaterstraat@CrivelloLaw.com](mailto:JWaterstraat@CrivelloLaw.com)>; Meyer, Brianna J. <[BMeyer@CrivelloLaw.com](mailto:BMeyer@CrivelloLaw.com)>; BWBaird@Borgelt.com <[BWBaird@Borgelt.com](mailto:BWBaird@Borgelt.com)>

Subject: Blake

Good Morning,

Attached please find correspondence from Attorney Bri Meyer along with Defendants First Set of Requests for Admissions, Interrogatories and Requests for Production of Documents to Plaintiffs and Defendants Response to Plaintiff's Fifth Requests for Production and Second Set of Interrogatories. Below via Sharefile please find the documents responsive to Plaintiff's Fifth Requests for Production. Thank you.

Crivello, Nichols & Hall, S.C.. Sharefile  
Attachments

Expires July 15,  
2024

1Z17575-documents responsive to pltf fift...273.PDF

308.4 KB

[Download Attachments](#)

Stephanie N. Kosmeder | Paralegal-Legal Assistant

[SKosmeder@CrivelloLaw.com](mailto:SKosmeder@CrivelloLaw.com)

Direct:414-615-8416



Crivello, Nichols & Hall, S.C.

710 North Plankinton Avenue Suite 500

Milwaukee, Wisconsin 53203

Main:414-271-7722

Fax: 414-271-4438

[CrivelloLaw.com](http://CrivelloLaw.com)

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